

EXHIBIT A

Firm Profile:

Founded in 2014, Towards Justice is a non-profit law firm that attacks the asymmetries in power that plague our marketplace with a focus on workplace injustice. We use impact litigation supported by targeted and strategic policy advocacy, and capacity building of workers' organizations and government agencies to attack systemic injustices that undermine the power of workers and consumers to achieve economic mobility.

Our litigation program attacks systemic economic injustice with a focus on legal violations that undermine worker power and erode human and civil rights. Our legal claims and strategies respond not to any particular legal rubric but to the actual injustice experienced by the clients we serve. We bring statutory claims under antitrust laws, consumer laws, wage-and-hour laws, discrimination laws, racketeering laws, and federal-and-state administrative procedure acts. Towards Justice has extensive experience litigating antitrust and fraud cases on behalf of low-income people, including in cases involving allegations that competitors have colluded around a minimum legal standard, for example, a minimum wage.

Representative Cases:

- **Bautista, et al. v. Carl Karcher Enterprises (L.A. Super. Ct.) (filed 2017)** – Current and former employees of Carl's Jr. restaurants filed a lawsuit in California state court alleging that Carl's Jr. and its parent company CKE engaged in a conspiracy to suppress the wages and working conditions of the restaurant-based managers who run hundreds of Carl's Jr. restaurants across the state by agreeing with each other not to hire each other's workers. This was the country's first franchise no-poach case in recent years and spurred extensive follow-on litigation and public enforcement efforts.
- **Beltran, et al. v. Interexchange, Inc., et al (D. Colo.) (filed 2014)** – A nationwide class of tens of thousands of au pairs alleged price fixing, racketeering, and wage theft against fifteen U.S. Department of State-designated "cultural exchange" sponsor organizations. Plaintiffs charged that these sponsors acted as a cartel to illegally set au pair wages far below the market rate and that some sponsors fraudulently misled potential au pairs in violation of racketeering and consumer protection laws. The court preliminarily approved the parties' proposed class action settlement for \$65.5 million in monetary relief and extensive prospective changes in the industry.
- **Douglas et al. v. Yellowstone Club Operations, LLC, and Hospitality Staffing Solutions LLC (D. Mont.) (filed 2018)** – A case on behalf of a putative class of dozens of black Jamaican citizens who spent the winter of 2017-2018 working in Montana as temporary non-immigrant H-2B visa workers for an ultra-exclusive golf and ski resort and allege that they were denied hundreds of dollars per day in stolen tips.

- **Gambles, Merck & Compo v. Sterling Infosystems, Inc. (S.D.N.Y.) (filed 2015)** – A case on behalf of a putative class of millions of consumers who allege that Sterling, an employment background check company, violated the Fair Credit Reporting Act.
- **Hispanic Affairs Project v. Perez (D.D.C.) (filed 2016)** – An Administrative Procedure Act case against the federal government on behalf of an association of shepherds who allege that the federal government has failed to prevent wage stagnation in the industry and improperly granted non-immigrant guest worker only temporary visas to work in the United States.
- **Llacua et al. v. Western Range Association et al. (filed 2016)** –Towards Justice represents former shepherds in a class action lawsuit alleging that ranchers across the Western United States colluded to depress shepherd wages, illegally deducted expenses from their meager paychecks, and misled state and federal governments in a pattern of racketeering activity. Plaintiffs allege that ranches hired their shepherds through an association constituted by competing ranches. In doing so, they sharply limited competition for shepherds and effectively fixed wages at the minimum allowable by law.
- **Mark v. O.P.E.N. America, Inc. d/b/a OPENWORKS (D. Colo.) (filed 2018)** – Towards Justice represents Plaintiff and a proposed class of cleaning workers employed by OpenWorks. OpenWorks is a cleaning company, but it claims not to employ cleaners. Instead, it requires its workers—many of whom are recent immigrants to the United States—to incorporate into separate LLCs and enter into franchise agreements under which they purportedly operate as independent companies. OpenWorks’s misclassification of its employees not only allows OpenWorks to skirt state and federal labor and employment laws. It also allows it to charge its workers predatory franchise fees and other costs, many of which it finances for its workers, thus indenturing them to OpenWorks with extraordinary debt that often exceeds what OpenWorks’s workers are able to earn through their work.
- **Menocal et al v. GEO Group Inc. (D. Colo.) (filed 2014)** – A class action brought by around 60,000 former immigration detainees against the GEO Group, Inc. (GEO), which operates a 1,500 bed immigrant detention facility in Aurora, CO. The suit, brought by detainees who worked for GEO for either \$1 per day or for no wages at all and under threat of solitary confinement, alleges that GEO violated state law and federal prohibitions against forced labor.

Attorney Bio:

David Seligman (J.D., Harvard Law School, *cum laude*, 2010; B.A., Williams College, *magna cum laude*, 2005) is the Director of Towards Justice where he litigates class and collective actions on behalf of low-wage workers with a particular focus on anticompetitive practices in the labor market. Before Towards Justice he was a staff attorney at the National Consumer Law Center working on forced arbitration and predatory auto lending. While at NCLC, he authored the Model State Consumer and Employee Justice Enforcement Act, which provides states with tools to mitigate some of the harms that forced arbitration causes low-income consumers and workers. Before joining NCLC, David clerked for Chief Judge Patti B. Saris of the District of Massachusetts and Judges Robert D. Sack and Susan L. Carney of the United States Court of Appeals for the Second Circuit. Publications: Sharon Block, Ben Elga, & David Seligman, *Ten Steps toward a Competitive Labor Market*, Biden Forum, July 2018; David Seligman, *Having Their Cake and Eating It Too: Antitrust Laws and the Fissured Workplace*, Issue Paper, Harvard Law School Labor & Worklife Program, June 2018; David Seligman, *The National Consumer Law Center's Model State Consumer and Employee Justice Enforcement Act: Protecting Consumers, Employees, and States from the Harms of Forced Arbitration Through State-Level Reforms*, 19 J. CON UMER & COM. L. 58 (2016); Abby Shafroth, David Seligman, Alex Kornya, Rhona Taylor, & Nick

Allen, *Confronting Criminal Justice Debt: A Litigation Guide*, National Consumer Law Center (2016); National Consumer Law Center, *Consumer Arbitration Agreements: Enforceability and Other Topics* (7th ed. 2014) & (6th ed.) (2013 Supp.).